

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
Sara Jenkins (CA Bar No. 230097)
sarajenkins@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
Teuta Fani (admitted *pro hac vice*)
teutafani@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
Crystal Nix-Hines (Bar No. 326971)
crystalnixhines@quinnemanuel.com
Alyssa G. Olson (CA Bar No. 305705)
alyolson@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
Xi ("Tracy") Gao (CA Bar No. 326266)
tracygao@quinnemanuel.com
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
1300 I Street NW, Suite 900
Washington D.C., 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100

Jomaire Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF JOINT LETTER BRIEF
IN RESPONSE TO ORDER RE
PRIVILEGE DISPUTE (DKT. 487-1,
DISPUTE P25)**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
7 LLC’s Administrative Motion to Seal portions of the Parties’ Joint Letter Brief in Response to Order
8 re Privilege Dispute, Dkt. 487-1, Dispute P25 (“Joint Letter Brief”). In making this request, Google
9 has carefully considered the relevant legal standard and policy considerations outlined in Civil Local
10 Rule 79-5. Google makes this request with the good faith belief that the information sought to be
11 sealed consists of Google’s confidential and proprietary information and that public disclosure could
12 cause competitive harm.

13 3. Google respectfully requests that the Court seal the redacted portions of the Joint
14 Letter Brief.

15 4. The information requested to be sealed contains Google’s confidential and
16 proprietary information regarding highly sensitive features of Google’s internal systems and
17 operations, including details related to project names, internal identifiers, Google’s internal practices
18 with regard to Incognito and its proprietary functions, as well as internal metrics and investigation
19 into financial impact of certain features, that Google maintains as confidential in the ordinary course
20 of its business and is not generally known to the public or Google’s competitors.

21 5. Such confidential and proprietary information reveals Google’s internal strategies,
22 system designs, and business practices for operating and maintaining many of its important services,
23 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 1-
24 2.

25 6. Public disclosure of such confidential and proprietary information could affect
26 Google’s competitive standing as competitors may alter their identifier system designs and practices
27 relating to competing products. It may also place Google at an increased risk of cyber security
28 threats, as third parties may seek to use the information to compromise Google’s data sources.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in San Francisco, California on March 25, 2022.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Attorney for Defendant